

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SAMUEL TURNER POOLE,)
)
Plaintiff,)
)
v.) C.A. No. 99-635-SLR
)
STAN TAYLOR, and)
RAPHAEL WILLIAMS,)
)
Defendants.)

**DEFENDANTS' 1st SUPPLEMENT TO THEIR REVISED RESPONSE TO
PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendants hereby supplement their revised response to *Plaintiff's Request for Production of Documents*¹ as follows:

5. All medical records containing to the July 6, 1999 incident report filed by everybody and even Medical Staff and Guards.

RESPONSE: Please refer to medical records at D00411-00454. A search continues for the incident report and, if it exists, it will be produced. Defendants supplement this response with the attached documents that are the logbook pages 259-264 for Pod 2L-M for July 6, 1999.

¹ Each Interrogatory is entered as presented to the Defendants by the Plaintiff in its entirety. The defendants has not altered the sentence structure or made grammatical or spelling corrections.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Marc P. Niedzielski
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Attorneys for Defendants

DATED: July 31, 2006

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CERTIFICATE OF SERVICE

The undersigned certifies that on the date indicated, he caused the attached Defendants' 1st Supplement to Their Revised Response to Plaintiff's Request for Production with the attached documents to be served by U.S. mail on the following individual:

Samuel Turner Poole
BN 5599
SCI Huntingdon
1100 Pike Street
Huntingdon, PA 16654-1112

/s/ Marc P. Niedzielski
Marc P. Niedzielski
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820 N. French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8400

DATED: July 31, 2006